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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

THE CITY OF PORTLAND,

DEFENDANT.

Case No. 3:12-cv-02265-SI

**AFFIDAVIT OF ELLEN OSOINACH IN
SUPPORT OF UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO PPA'S MOTION TO
INTERVENE**

STATE OF OREGON)
) ss.
County of Multnomah)

I, ELLEN OSOINACH, being first duly sworn, do depose and say:

1. I am an attorney representing Defendant City of Portland in the above-entitled matter and I make this affidavit in support of Defendant City's request for an extension of time in which to file a response to Intervenor Portland Police Association's FRCP 24 Motion to Intervene.

2. Plaintiff filed this case in the United States District Court for the District of Oregon on December 17, 2012.

3. The Portland Police Association filed a Motion to Intervene in this case on December 18, 2012.

4. I am requesting an additional two weeks to respond to the PPA's Motion in order to gather necessary information from several people who are unavailable until early January due to holiday vacations.

5. This motion is presented in good faith and not for reasons of delay.

/s/ Ellen Osoinach
Ellen Osoinach

SUBSCRIBED AND SWORN TO before me this 20th day of December, 2012, by Ellen Osoinach.

/s/ Clairissa A. Warnock
Notary Public – State of Oregon
Commission No.: 452912
Commission Expiration: October 16, 2014